

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KINGS ROAD HOLDINGS VII LTD and
KINGS ROAD INVESTMENTS LTD,

Plaintiffs,

- against -

PAUL A. MOORE;
MBC GLOBAL, LLC;
MOORE INVESTMENTS, INC.; and
RED CANYON ADVISORS, LLC,

Defendants.

12-CV-08657 (RWS)

**DECLARATION OF
PAUL D. SARKOZI
IN FURTHER SUPPORT OF
DEFENDANTS' MOTION
TO SET ASIDE THE
ENTRIES OF DEFAULT**

I, PAUL D. SARKOZI, do hereby declare under the penalty of perjury pursuant to 28
U.S.C. § 1746 as follows:

1. I am a member of the law firm Tannenbaum Helpert Syracuse & Hirschtritt LLP,
located at 900 Third Avenue, New York, New York 10022. I submit this Declaration in further
support of Defendants' Motion to Set Aside the Entries of Default.

2. Attached hereto as Exhibit C is a true and correct copy of a Minute Entry in
Peterson v. KL International LLC, et al., Case No. A-10-623674-C, as set forth on the website
for the Clark County District Court in the State of Nevada, noting that Defendant Paul Moore's
Motion to Set Aside the Default Judgment was granted.

I declare under penalty of perjury that the foregoing statements are true and correct.

Dated: New York, New York
May 13, 2013



PAUL D. SARKOZI

EXHIBIT C

5/13/13

<https://www.clarkcountycourts.us/Anonymous/CaseDetail.aspx?CaseID=7694609&HearingID=131012267&SingleViewMode=Minutes>

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REGISTER OF ACTIONS**CASE No. A-10-623674-C**

Morris Peterson, Plaintiff(s) vs. KL International LLC,
Defendant(s)

§
§
§
§
§
§

Case Type: **Breach of Contract**
 Date Filed: **08/23/2010**
 Location: **Department 13**
 Conversion Case Number: **A623674**

PARTY INFORMATION**Defendant KL International LLC****Lead Attorneys****Defendant Moore, Paul**

Richard McKnight
Retained
 7023887185(W)

Defendant Red Canyon Advisors

Plaintiff Morris Peterson *Formerly Known*
As Morris Pickering and Peterson

Steve L. Morris
Retained
 7024749400(W)

EVENTS & ORDERS OF THE COURT

05/14/2012 **Motion to Set Aside Default Judgment (9:00 AM)** (Judicial Officer Denton, Mark R.)
Defendant Paul Moore's Motion to Set Aside Default Judgment

Minutes

05/14/2012 9:00 AM

- Jean-Paul Hendricks, Esq., for Plaintiff Richard McKnight, Esq., for Defendant Moore As to Defendant Paul Moore's Motion to Set Aside Default Judgment, counsel argued lack of service versus avoiding service. Upon Court's inquiry, Mr. McKnight said that service will be made if the Court grants the motion. Following argument, COURT ORDERED Motion GRANTED; Defendant Moore to pay One Thousand Dollars (\$1,000) in attorney fees to Plaintiff's counsel within thirty (30) days from today. Mr. McKnight to submit Order.

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